

—THE LAW OFFICES OF—

Special | Hagan

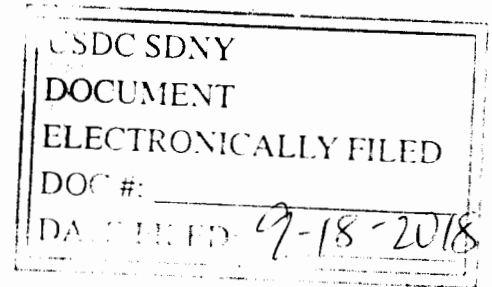
196-04 HOLLIS AVENUE
SAINT ALBANS, NEW YORK 11412
P: (917) 337-2439
FAX: (914) 467-4137

September 10, 2018

VIA ECF

Honorable Laura Taylor Swain
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
Southern District of New York
500 Pearl Street, Courtroom 12D
New York, New York 10007-1312

MEMO ENDORSED



RE: Edwards v. Shulkin
16-CV-8031(LTS)

Dear Judge Taylor Swain:

I am writing to request a continuance of fact discovery for 60 days on this matter due to ongoing health, personal problems and scheduling conflicts. Unfortunately, I have had to reschedule one deposition because of my health during the interim period, and I have also had additional health issues with the scheduling of another. Defendants have been incredibly patient with me to date, and I apologize to both them and the Court for any ongoing inconvenience.

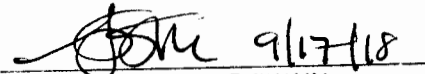
Additionally, I am seeking a continuance because I have a case that is going to trial on September 24, 2018, the matter of Wilson v. City of New York 12-cv-6024 (BMC)(LB). The matter was originally filed six years ago and recently Judge Townes passed away. The case was eventually re-assigned to Judge Brian Cogan and upon disposition of a pending summary judgment motion, we have been scheduled for trial.

Unfortunately, between my health and the other scheduling of my cases I am respectfully requesting the Court's leniency. I truly thought that I would be able to work with defendants to complete discovery within the requested time period, however my circumstances have not permitted me to move forward. However, I am certain that the requested extension will provide me with the time needed to conduct full discovery, try the two dormant cases that are upcoming for trial in both the Eastern District of New York and New York Supreme Court and to fully recover. Again I extend my most sincere apologies for the ongoing and repeated requests for extensions and postponements.

Respectfully,

/s/

SO ORDERED:


HON. LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE

The parties are directed to take this issue up with Magistrate Judge Wang, to whom this case is now referred for General Pretrial Management. Judge Wang's attention is respectfully directed to docket entries 47-50.